U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
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May 13, 2025

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> Re: *United States v. Roman Storm, et al.*, S1 23 Cr. 430 (KPF)

Dear Counsel:

The Government hereby provides notice that it anticipates calling Special Agent William Lopez of the Federal Bureau of Investigation ("FBI") as a witness in the trial of the above-referenced matter. Enclosed is a disclosure made pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) stating the anticipated opinions of Special Agent Lopez and the bases and reasons for them. The Government reserves the right to supplement and/or amend Special Agent Lopez's anticipated testimony and will do so promptly pursuant to the requirements of Rules 16(a)(1)(G)(vi) and 16(c).

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Very truly yours,

JAY CLAYTON
United States Attorney

by: /s/ _____

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Enclosure

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Expert Disclosure – Special Agent William Lopez
(May 13, 2025)

Special Agent Lopez is a certified member of the Federal Bureau of Investigation ("FBI") Cellular Analysis Support Team ("CAST"). He will be called to testify regarding historical cell site analysis, as further described below.

A. Qualifications and Prior Testimony

Special Agent Lopez has been a certified member of the FBI's CAST group since September 2022. CAST is a group of special agents with specialized training in analyzing cellular telephone records, including training in interpreting data regarding the locations of communication towers used to transmit cellular voice, text, and data communications. Special Agent Lopez's qualifications and a list of all cases in the last four years in which he testified as an expert are contained in his *curriculum vitae*, attached hereto as Appendix A.

B. Anticipated Opinions

The Government expects that Special Agent Lopez will testify about cellular network operations, including but not limited to their design, coverage, testing, and performance, and offer his expert opinion about the likely approximate locations of certain cellphones at the times that the cellphones connected to specific cell sites in Manhattan, New York between approximately March 1, 2022 and August 8, 2022. The Government expects that Special Agent Lopez's testimony will be accompanied by certain exhibits relevant to his cell site location analysis and conclusions. The Government will provide these exhibits on or before the June 30, 2025 exhibit deadline.

With respect to cellular network operations and certain related topics, Special Agent Lopez is expected to testify that: (1) cellular service providers' cellular networks consist of cell sites, which are designed to provide service to cellular service providers' customers in a given area; (2) cellular service providers locate, arrange, and optimize cell sites with the goal of ensuring sufficient geographical coverage and capacity to service all users and further collect, store, and analyze cell site location data for wireless devices, including cellphones, that connect to those cell sites; (3) to accomplish these goals in densely populated metropolitan areas, cellular service providers place multiple cell sites, each of which is intended to service a relatively small geographical area that typically spans a few city blocks, depending on the surrounding geography, topography, and the proximity of other nearby cell sites; (4) the cellular network for T-Mobile in the New York City area in 2022 is consistent with this placement; (5) wireless devices, including cellphones, are designed to meet universal industry protocols by which cellphones connect to the cell site that provides the strongest and clearest signal; (6) often (but not always), the nearest cell site provides this signal; however, the nearest cell site may not provide the strongest and clearest signal due to the geography and topography of an area or network design, which implicates both natural and man-made obstructions; (7) even where the nearest cell site does not provide the strongest and clearest signal, the second-nearest cell site likely would provide this signal, for the same reasons of geography and topography, and in Special Agent Lopez's experience conducting drive tests to analyze cellular networks' performance and analyzing cell site data to locate individuals in real time, he has frequently observed cellphones connect to one of the three or at

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most four-nearest cell sites; (8) the universal industry protocols that result in a cellphone connecting to the cell site with the strongest and clearest signal are a necessity because they allow cellular networks to reliably, predictably, and efficiently service customers and allow for wireless device inter-operability across different cell sites as well as different regions around the country and manufacturers of cellphones; and, for all of these reasons, (9) analyzing cell site location data obtained from cellular service providers is a reliable way to approximate the geographical area or range within which a wireless device, including a cellphone, was likely located at the time that it connected to a cell site, particularly in metropolitan areas with dense cellular networks, including for cellphones serviced by T-Mobile in the New York City area in 2022.

With respect to the particular cellphones and the approximate locations of those cellphones on particular dates, Special Agent Lopez will testify about cellphone numbers (952) 270-7909 ("Cellphone-1") and (512) 905-4854 ("Cellphone-2"). Special Agent Lopez will testify that the size of the coverage area for a cell site will vary based on the network layout and cellular density in the area. Each cell site is specifically designed to provide coverage to an area in its immediate vicinity. The approximate coverage of a cell site area can be determined by analyzing the proximity and number of adjacent cell sites. Special Agent Lopez is expected to testify that based on his review of the cell site location data produced in discovery on March 18, 2025, bearing control numbers USAO_0032617 through USAO_0032624, Cellphones-1 and -2 were located in Manhattan, New York on the following dates between March 1, 2022 and August 8, 2022:
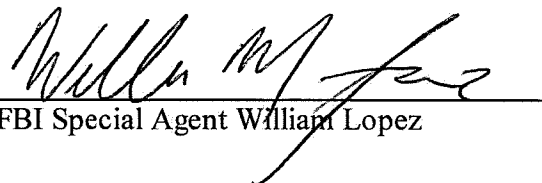
Cellphone-1:
- March 2-4, 8, 10, 11, 14, 15, 18, 19, 21, 23, 24, 27, 28, 30, and 31, 2022
- April 1, 5-9, 11, 16-20, 22, and 26-29, 2022
- May 1, 7, 11, 13, 20, 21, 25, and 28, 2022
- June 2, 3, 8, 15, and 19, 2022
- July 11-19, 21, 22, 28, and 29, 2022
- August 3, 4, and 7, 2022

Cellphone-2:
- April 20-22, 24, and 26, 2022

C. Approval and Signature

I hereby approve the disclosure of my qualifications, anticipated opinions, and bases for such opinions, as set forth above.

_____
FBI Special Agent William Lopez

APPENDIX A

CURRICULUM VITAE

William M. Lopez
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New York Division
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New York, NY 10278
wmlopez@fbi.gov

PROFESSIONAL EXPERIENCE

Federal Bureau of Investigation   **New York, NY**
Special Agent   March 2025 – Present

- 2025 – Present: Currently assigned to Long Island, Violent Crime and Gang Task Force. Investigate violent crime, gangs, and criminal enterprise networks.
- Provide cellular record analysis and technological assistance to local, state, federal, and foreign law enforcement partners including mapping and analyzing records.

Federal Bureau of Investigation   **Richmond, VA**
Special Agent   June 2022 – March 2025

- 2022 – Present: Currently assigned to a Public Corruption/Violent Crimes Against Children/Civil Rights squad which investigates a variety of criminal violations. Specifically, assigned to Civil Rights investigations to include FACE Act, Hate Crimes, and Color of Law violations.
- Provide cellular record analysis and technological assistance to local, state, federal, and foreign law enforcement partners including mapping and analyzing records.

Federal Bureau of Investigation   **San Juan, PR**
Special Agent   July 2018 – June 2022

- 2018 – 2022: Assigned to the FBI San Juan Joint Terrorism Task Force (JTTF), which is comprised of local, state and Federal investigators whose responsibilities include investigating a variety of federal violations, including international/domestic terrorism and money laundering. Specifically worked domestic terrorism in the San Juan area of responsibility.
- Provided cellular record analysis and technological assistance to CAST members in the field and directly to local, state and federal law enforcement including mapping and analyzing records.

Federal Bureau of Investigation   **New York, NY**
Intelligence Analyst   June 2016 - July 2018

- 2016 – 2018: Embedded on a Russian Organized Crime squad that investigated a variety of criminal violations to include extortion, theft, trafficking in stolen goods, and fraud.
- Responsible for providing tactical analysis to include but not limited to: telephone analysis, travel analysis, social media exploitation, and financial analysis to investigators responsible for investigating federal violation elements of organized crime.
- Provided cellular record analysis and technological assistance to CAST members in the field and directly to local, state and federal law enforcement including mapping and analyzing records.

Federal Emergency Management Agency   **Kew Gardens, NY**
Hazard Mitigation Specialist   April 2015 – June 2016

- 2015 – 2016: Provide technical assistance to FEMA reviewers, States and sub-grantees to identify contract needs and facilitate training to support this effort.
- Develop tools and resources to assist with contract management, and responding to program inquiries regarding technical assistance.

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- Monitor the status and performance of contracts, including performance reports, financial management, and close-out. Coordinate these efforts with the Risk Reduction team to ensure consistent program delivery.

EDUCATION

Long Island University
Brookville, NY   August 2012 to December 2014
Master of Public Administration

State University of New York at Cortland
Cortland, NY   August 2007 to May 2012
Bachelor of Science in Speech and Hearing Sciences

PROFESSIONAL TRAINING

FBI Cellular Analysis Survey Team

- Cellular Analysis Survey Team (CAST) Certification Course (August – September 2022): FBI sponsored course including 40 hours of instruction from the Florida Institute of Technology on Radio Frequency (RF) Theory and cellular networks including GSM, CDMA, UMTS, LTE, and 5G protocols. Classroom and hands-on training on the use of the Gladiator Autonomous Receiver (GAR) for mobile drive testing. Instruction received directly from the cellular providers and their engineers for each of the four major cellular carriers, AT&T, T-Mobile, U.S. Cellular, and Verizon. Received legal training and instruction on expert witness testimony. (160 Hours)

- CAST Critical Incident Readiness Assessment (June 2021): FBI sponsored field training exercise course focused on cell phone technology and geolocation analysis related to critical incidents. The course utilized practical case scenarios requiring students to apply their understanding of cellular theory to the analysis of CDRs with cell site location information to identify, solve and create a report regarding the specific case. The course also involved combining the principles of cellular theory with the analysis of CDRs to locate cell phones in the field. (24 Hours)

- CAST Advanced Historical Cell Site Analysis Course (April 2021): FBI sponsored course providing advanced instruction on cellular theory and the analysis of historcal CDRs with cell site location informaton through various case studies. The course also included the creation of cellular analysis reports. (32 Hours)

- CAST Basic Historical Cell Site Analysis Course (January 2020): FBI sponsored course providing an introduction to cellular theory and the analysis of historical call detail records (CDRs) with cell site location information from the four major US-based cellular service providers (AT&T, Sprint, T-Mobile, Verizon). (24 Hours)

Exploiting Mobile Communications   July 2018
Exploiting Network Communications   August 2016
Introduction to Geospatial Intelligence   August 2016
Intelligence Analyst Basic Training   June 2016

Qualifed as an Expert Witness

*1/23/24 – **Commonwealth of VA v. Sherard L'Juan Wright** - Chesterfield County Circuit Court – Chesterfield, VA – Historical Cell Site and Location Data Analysis*
*3/29/24 – **Commonwealth of VA v John Dontrel Harris** - Suffolk County Circuit Court – Suffolk, VA – Historical Cell Site and Location Data Analysis*
*3/20/25 – **State of Maryland v Edgard Castro Contreras and Sender Godoy Lemus** – Montgomery County Circuit Court – Rockville, MD – Historical Cell Site and Location Data Analysis*

Updated May, 2025.